

THE STATE OF NEW HAMPSHIRE
WASTE MANAGEMENT COUNCIL

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Appeal of Collins & Aikman Automotive Interiors, Inc.
Docket No. 04-12-WMC

STATE'S EXHIBIT AND WITNESS LIST

NOW COMES the Department of Environmental Services ("DES"), by and through its attorneys, the Office of the Attorney General, and respectfully submits the following Witness and Exhibit List in anticipation of a hearing scheduled for July 22, 2004:

WITNESS

1. Susan Willoughby, Department of Environmental Service, 29, Hazen Drive, Concord, NH

EXHIBITS

1. Original Groundwater Management Permit ("GMP").
2. Revised GMP (including cover letter) dated April 1, 2004.
3. May 6, 2003 NHDES Letter (RAP comments and Remedy Selection).
4. August 19, 2003 DOJ letter outlining performance dates for OB-3/BR-1a.
5. October 10, 2003 Letter from Collins & Aikman (H&A) – "*Groundwater Quality Monitoring Program*"
6. September 15, 2003 NHDES letter "*Design Report, Enhanced In-Situ Bioremediation System*" comments.
7. June 28 Telecom between Jim Griswold and Susan Willoughby regarding agreement to add MW700 series.
8. Consent Decree, as amended.

RESPECTFULLY SUBMITTED

State of New Hampshire
Department of Environmental Services

By it Attorney,
Kelly A. Ayotte
Acting Attorney General

By:

Richard W. Head
Assistant Attorney General
Environmental Protection Bureau
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7/12/04

COPY

CERTIFICATION

I certify that a copy of this Motion has been forwarded via first class mail to Sherilyn Barnett Young, Esq.


Richard W. Head